

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Conditional Major, Administrative Amendment

Permit: F-07-001 R1

International Paper Company

Richwood, KY 41094

September 15, 2008

Ibrahim AL-Burai, Reviewer

SOURCE ID: 21-015-00106

SOURCE A.I. #: 37270

ACTIVITY ID: APE20080001

REVISION 1:

On July 29, 2008, the company submitted an application for a name/ownership change from Weyerhaeuser Company, to International Paper Company.

SOURCE DESCRIPTION:

The Division received an application for renewal of Conditional Major permit F-01-043 (Revision 2) on November 7, 2006. Weyerhaeuser Company currently operates a flexographic printing and platemaking facility in Richwood, Kentucky. The changes that have occurred since issuance of permit F-01-043 on May 9, 2002 are (1) a name change and (2) a permit revision to replace an existing plate developing machine with a Cyrel Batch Processor, model 300BP, a Grieve Drawer Oven, and a PRI Plate-Vac model PV-500. The renewal application indicates that no additional changes have occurred that require consideration in the air quality permit.

COMMENTS:

VOC emissions from point 01, the flexographic printer, originate from inks, pH adjuster, propylene glycol and clean up solvent. VOC emissions from point 03, varnish application, originate from varnish. VOC emissions point 04, the Cyrel Batch Processor, model 300BP, a Grieve Drawer Oven, and a PRI Plate-Vac model PV-500 originate from plate material cleaning solvent. VOC and HAP emissions are determined by material balance and are based on the hourly usage rates of each material specified in the renewal application. It is assumed that the entire content of VOC and HAP in the materials is emitted.

EMISSION AND OPERATING CAPS DESCRIPTION:

This facility is exempt from the requirements of 401 KAR 59:212, Section 3(2) by meeting the condition of utilizing inks with an emission limit of five-tenths (0.5) lb VOC/lb solids as delivered to the applicator as specified in 401 KAR 59:212, Section 6(4). The actual VOC emissions shall not exceed 50.0 tons per rolling twelve month period.

PERIODIC MONITORING:

The usage rate of VOC containing materials shall be monitored and recorded on a monthly basis. VOC emissions shall be calculated monthly. The twelve month rolling total VOC emissions shall be determined monthly. Annual records on natural gas usage in the dryers shall be maintained.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.